

# Target Market Determination – Rajomon Growth Fund

This Target Market Determination (**TMD**) is required under section 994B of the *Corporations Act 2001* (Cth) (**the Act**). It sets out a class of consumers for whom the product, including its key attributes, would likely be consistent with their likely objectives, financial situation and needs. The TMD additionally outlines distribution conditions and information related to review and monitoring as well as certain other information. It forms part of the Issuer’s design and distribution arrangements for the Rajomon Growth Fund (**Product**).

This document is **not** a product disclosure statement and **not** a summary of the product features or terms of the product. This document provides general information only and does not take into account any person’s individual objectives, financial situation or needs. Persons interested should carefully read the Product Disclosure Statement (PDS) for the Product before making a decision whether to buy this Product.

Target Market Summary	<p>This product is likely to be appropriate for consumers seeking to allocate towards a highly diversified investment holding, focused on capital growth with the potential to also receive income distribution.</p> <p>The consumer will typically have a medium to long term investment horizon, a medium to extremely high risk/return profile and requires access to capital on a monthly basis.</p> <p>Due to the highly diversified asset allocation of the Fund, the product may likely be an appropriate product as a satellite to core component of an investment portfolio.</p>
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<b>Fund</b>	<b>Rajomon Growth Fund</b>	<b>Issuer</b>	<b>Vasco Trustees Limited</b>
<b>ARSN</b>	ARSN 664 946 801	<b>Issuer ABN</b>	ACN 138 715 009
<b>Date TMD approved</b>	25 October 2024	<b>Issuer AFSL</b>	AFSL 344 486
<b>TMD Version</b>	2.0	<b>TMD Status</b>	Current

## DESCRIPTION OF TARGET MARKET

### TMD Indicator Key

The Consumer Attributes for which the product is likely to be appropriate have been assessed using a red/amber/green rating methodology with appropriate colour coding:

In target market	See Issuer's Instructions	Not considered in target market
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### Issuer's Instructions

In the tables below, Column 1, Consumer Attributes, indicates a description of the likely objectives, financial situation and needs of the class of consumers that are considering this product. Column 2, TMD indicator, indicates whether a consumer meeting the attribute in column 1 is likely to be in the target market for this product.

Generally, a consumer is unlikely to be in the target market for the product if:

- **one or more** of their Consumer Attributes correspond to a **red** rating, or
- **three or more** of their Consumer Attributes correspond to an **amber** rating.

Definitions of terms are in the attachment or otherwise in the PDS.

## APPROPRIATENESS

The Issuer has assessed the product and formed the view that the product, including its key attributes, is likely to be consistent with the likely objectives, financial situation and needs of consumers in the target market as described above, as the features of this product in Column 3 of the table above are likely to be suitable for consumers with the attributes identified with a green TMD Indicator in Column 2.

### Investment Products and Diversification

A consumer (or class of consumer) may intend to hold a product as part of a diversified portfolio (typically with an intended product use of satellite/small allocation, minor allocation, or core component). In such circumstances, the product should be assessed against the consumer's attributes for the relevant portion of the portfolio, rather than the consumer's portfolio as a whole. For example, a consumer may seek to construct a conservative portfolio with a satellite/small allocation to growth assets. In this case, it may be likely that a product with a High or Very High risk/return profile is consistent with the consumer's objectives for that allocation notwithstanding that the risk/return profile of the consumer as a whole is Low or Medium. In making this assessment, distributors should consider all features of a product (including its key attributes).

Consumer Attributes	TMD Indicator	Product description including key attributes
<b>Consumer's investment objective</b>		
Capital Growth	<b>In target market</b>	<p>The Fund will make investments into a diversified portfolio of listed and unlisted equities and indirect investments into real property assets via various managed investment schemes or vehicles as selected by the Investment Manager. The Fund may make direct investments into select real property assets, although the allocation is unlikely to be material, being less than 10% of the Fund's assets.</p>
Capital Preservation	<b>Not considered in target market</b>	<p>A tactical asset allocation strategy will be implemented to ensure the construction of a diversified investment portfolio spread across the six major asset classes and in accordance with the indicative asset allocation guidelines.</p>
Income Distribution	<b>See Issuer' Instructions</b>	<p>The Investment Manager is targeting an annual rate of return to Investors of 8%, pre-tax and net of all fees and expenses, over a rolling 3-year period. Investors should note that this is a target only and is not a forecast or guaranteed return and actual returns may be lower than the target return.</p> <p>Distributions are expected to be paid at least once per annum with an intention to pay additional distributions throughout the year, subject to the receipt of distribution income from the underlying investments and the capital and liquidity positioning of the Fund.</p> <p>The Fund is targeted for investors seeking capital growth. Investors seeking income distribution may be within the target market, however they should first seek financial advice.</p>

<b>Consumer's intended product use (% of investable assets)</b>		
Solution/Standalone (up to 100%)	<b>Not considered in target market</b>	<p>The Fund will directly invest in the following six major asset classes:</p> <ol style="list-style-type: none"> <li>1. Property Securities;</li> <li>2. Australian Equities;</li> <li>3. Global Equities;</li> <li>4. Fixed Income Securities;</li> <li>5. Alternative Investments; and</li> <li>6. Cash.</li> </ol> <p>via listed and unlisted instruments in a domestic and international context.</p> <p>The asset allocation of the Fund provides for exposure across a wide range of asset classes to construct a highly diversified portfolio of growth and defensive assets. As such, the Fund may likely be an appropriate product as a core, minor or satellite component of an investment portfolio.</p>
Major allocation (up to 75%)	<b>Not considered in target market</b>	
Core component (up to 50%)	<b>In target market</b>	
Minor allocation (up to 25%)	<b>In target market</b>	
Satellite/small allocation (up to 10%)	<b>In target market</b>	
<b>Consumer's investment timeframe</b>		
Short ( $\leq 3$ years)	<b>Not considered in target market</b>	As the intended Target Return for the Fund is based on a rolling 3-year basis, the recommended minimum investment timeframe for the Fund is greater than 3 years.
Medium ( $> 3$ years and $\leq 6$ years)	<b>In target market</b>	As such, the Fund is therefore likely only to be appropriate for investors with a medium to long investment timeframe of three years or greater.
Long ( $> 6$ years)	<b>In target market</b>	
<b>Consumer's Risk (ability to bear loss) and Return profile</b>		
Extremely High	<b>In target market</b>	The Fund has a risk level of Medium to Extremely High.
Very High	<b>In target market</b>	
High	<b>In target market</b>	The Fund will invest in a diversified portfolio of growth and defensive assets in both domestic and international markets. The Fund intends to execute a tactical asset allocation strategy with rebalancing on a regular basis and strategic adjustments on monthly basis.
Medium	<b>In target market</b>	
Low	<b>Not considered in target market</b>	

		<p>The relevant risks are highlighted in the Fund PDS. Specific risks relevant to an investor’s risk and return include:</p> <ul style="list-style-type: none"> <li>• The value of an investment may fall if the value of the Fund’s assets falls</li> <li>• The Fund may not make regular distributions, or at all, as the income available for distribution is dependent upon a variety of risks associated with an investment including liquidity, valuation, and capital loss risk.</li> </ul> <p>This Fund is targeted at Investors of medium to extremely high risk / return profile or higher. Investors with a lower level of risk tolerance are not suitable for this Fund and not within the target market given the liquidity, valuation, loan loss risk, and the other associated risks as described in the PDS.</p>
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<b>Consumer’s need to access money</b>		
Within one week of investing	<b>Not considered in target market</b>	<p>The Fund will predominantly invest in highly liquid domestic and international listed or unlisted assets across the six major asset classes.</p> <p>Subject to the satisfaction of the Minimum Investment Term of each investor, withdrawal requests are processed on a monthly basis. Withdrawal offers are not guaranteed and may be suspended or scaled back. Investors seeking to have access to their capital before the expiry of the Minimum Investment Term are not within the target market.</p>
Within one month of investing	<b>Not considered in target market</b>	
Within three months of investing	<b>Not considered in target market</b>	
Within one year of investing	<b>Not considered in target market</b>	
Within 5 years of investing	<b>In target market</b>	<p>Once processed, it is expected that the withdrawn amount will be paid to the nominated account of the investor within 15 business days at the end of the month.</p>
Within 10 years of investing	<b>In target market</b>	
After 10 years or more of investing	<b>In target market</b>	

## DISTRIBUTION AND REVIEW

This product can only be offered and/or issued in accordance with the relevant product terms and conditions outlined in the PDS (as amended from time to time).

Distribution Conditions/restrictions	
Distribution channel	Condition / rationale
The offer is available to persons receiving the PDS within Australia but does not constitute an offer of interests in any jurisdiction where, or to any persons to whom, it would be unlawful to make the offer.	It is the responsibility of any overseas applicant to ensure compliance with all laws of any country relevant to the offer. The return of a duly completed Application Form will be taken to constitute a representation and warranty that there has been no breach of such laws and that all approvals and consents have been obtained.
Direct	<p>Direct investors who are wholesale or sophisticated investors can invest in the Fund.</p> <p>Direct investors who are retail investors are asked to complete a series of questions in the application form in order for the Issuer to understand whether the consumer is likely to be within the target market. The Issuer will review the information provided in response to the questions, assess those answers against the Fund's key attributes (set out above), and assess whether it is likely the investor is in the target market and an investment in the Fund would likely be consistent with the likely objectives, financial situation and needs of the investor. Where the Issuer concludes the investor is not likely to be within the target market, the Issuer may reject the application or seek further information from the investor.</p>
Adviser (personal advice)	<p>Investor to confirm through online application they have received personal advice.</p> <p>Financial adviser to provide details of AFS licence and confirm they have reviewed and considered the TMD in providing personal advice to the investor.</p>
Platforms	<p>This Fund may be available through specified distributors or distribution channels, such as investment or super platforms, or wrap products (Platforms).</p> <p>As distributors, Platform providers are expected to take reasonable steps that will, or are likely to, result in distribution of the Fund being consistent with its TMD.</p>

**Review triggers**

- 1) Any material change to key attributes, fund investment objective and/or fees which may reasonably suggest the TMD is no longer appropriate.
- 2) Any material deviation from benchmark / objective over sustained period.
- 3) The key attributes have not performed as disclosed by a material degree and for a material period.
- 4) Any significant increase in fund outflow or losses suffered by unit holders which reasonably suggests the product is not going to achieve its investment objective over a certain time.
- 5) The liquidity of the product has changed, reasonably suggesting that this TMD is no longer appropriate.
- 6) Determination by the Issuer of a Significant Dealing to be reported to ASIC which reasonably suggests that TMD is no longer appropriate.
- 7) The receipt of a material or unexpectedly high number of complaints (as defined in section 994A(1) of the Act) from consumers who have acquired this product, regarding the product design, features, availability and distribution condition that would reasonably suggest the TMD is no longer appropriate.
- 8) The receipt of a Product Intervention Power order from ASIC
- 9) The receipt of regulatory orders or directions that affects the product.

**Mandatory review periods**

<b>Review period</b>	<b>Maximum period for review</b>
Initial Review	1 Year from the date of this TMD.
Subsequent review	1 Year from the date of the prior review (for whatever reason)

**Distributor reporting requirements**

<b>Reporting requirement</b>	<b>Reporting period</b>	<b>Which distributors this requirement applies to</b>
Complaints (as defined in section 994A(1) of the Act) relating to the product design, product availability and distribution. The distributor should provide all the content of the complaint, having regard to privacy.	As soon as practicable, but within 10 business days following end of calendar quarter.	All distributors
Significant dealing outside of target market, under s994F(6) of the Act. See Definitions for further detail.	As soon as practicable but no later than 10 business days after distributor becomes aware of the Significant dealing that is outside the target market.	All distributors

To the extent a distributor is aware of dealings outside the target market these should be reported to the issuer, including reason why acquisition is outside of target market, and whether acquisition occurred under personal advice.	As soon as practicable, but within 10 business days following end of calendar quarter.	All distributors
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*This document provides general information only and does not take into account a person's individual objectives, financial situation or needs. Before making an investment decision a person should critically assess whether this product is appropriate and obtain financial advice tailored to the person having regard to personal objectives and circumstances. This document is not a financial product recommendation or an offer or solicitation with respect to the purchase or sale of any financial product in any jurisdiction.*



## DEFINITIONS

Term	Definition
<b>Consumer's investment objective</b>	
Capital Growth	The consumer seeks to invest in a product designed or expected to generate capital return over the investment timeframe. The consumer prefers exposure to growth assets (such as shares or property) or otherwise seeks an investment return above the current inflation rate.
Capital Preservation	The consumer seeks to invest in a product designed or expected to have low volatility and minimise capital loss. The consumer prefers exposure to defensive assets that are generally lower in risk and less volatile than growth investments.
Income Distribution	The consumer seeks to invest in a product designed to distribute regular and/or tax-effective income. The consumer prefers exposure to income-generating assets (typically, high dividend-yielding equities, fixed income securities and money market instruments).
<b>Consumer's intended product use</b>	
Solution/Standalone (up to 100%)	The consumer may hold the investment as up to 100% of their total <i>investable</i> assets. The consumer is likely to seek a product with <i>very high</i> portfolio diversification.
Major allocation (up to 75%)	The consumer may hold the investment as up to 75% of their total <i>investable</i> assets. The consumer is likely to seek a product with at least <i>high</i> portfolio diversification.
Core Component (up to 50%)	The consumer may hold the investment as up to 50% of their total <i>investable</i> assets. The consumer is likely to seek a product with at least <i>medium</i> portfolio diversification.
Minor allocation (up to 25%)	The consumer may hold the investment as up to 25% of their total <i>investable</i> assets. The consumer is likely to seek a product with at least <i>low</i> portfolio diversification.
Satellite / small allocation (up to 10%)	The consumer may hold the investment as up to 10% of the total investable assets. The consumer may seek a product with <i>very low</i> portfolio diversification. Products classified as <i>extremely high</i> risk are likely to meet this category only.
Investable Assets	Those assets that the investor has available for investment, excluding the residential home.
<b>Portfolio diversification (for completing the key product attribute section of consumer's intended product use)</b>	
Very Low	The product provides exposure to a single asset (for example, a commercial property) or a niche asset class (for example, minor commodities, crypto-assets or collectibles).
Low	The product provides exposure to a small number of holdings (for example, a portfolio of real property assets or fewer than 25 securities) or a narrow asset class, sector or geographic market (for example, a single major commodity (e.g. gold) or equities from a single emerging market economy).
Medium	The product provides exposure to a moderate number of holdings (for example, up to 50 securities) in at least one broad asset class, sector or geographic market (for example, Australian fixed income securities or global natural resources).

High	The product provides exposure to a large number of holdings (for example, over 50 securities) in multiple broad asset classes, sectors or geographic markets (for example, global equities).
Very High	The product provides exposure to a large number of holdings across a broad range of asset classes, sectors and geographic markets with limited correlation to each other.
<b>Consumer's Risk (ability to bear loss) and Return profile</b>	
Short ( $\leq 3$ years)	The minimum suggested timeframe for holding the product. Typically, this is the rolling period over which the investment objective of the product is likely to be achieved.
Medium ( $> 3$ years and $\leq 6$ years)	The consumer has a medium investment timeframe and is unlikely to redeem within five years.
Long ( $> 6$ years)	The consumer has a long investment timeframe and is likely to redeem within a term longer than five years.
<b>Consumer's Risk (ability to bear loss) and Return profile</b>	
<p>The Issuer has adopted the Standard Risk Measure (SRM) to estimate the likely number of negative annual returns for this product over a 20 year period, using the guidance and methodology outlined in the Standard Risk Measure Guidance Paper For Trustees (note the bands in the SRM guidance differ from the bands used in this TMD). However, SRM is not a complete assessment of risk and potential loss. For example, it does not detail important issues such as the potential size of a negative return (including under conditions of market stress) or that a positive return could still be less than a consumer requires to meet their investment objectives/needs. The Issuer has supplemented the SRM methodology by other risk factors. For example, the potential impact of liquidity or withdrawal limitations, valuation risks or risks of capital loss, which have been documented together with the SRM to substantiate the product risk rating.</p> <p>A consumer's desired product return profile would generally take into account the impact of fees, costs and taxes.</p>	
Extremely High	<p>For the relevant part of the consumer's portfolio, the consumer:</p> <ul style="list-style-type: none"> <li>• has an extremely high risk appetite,</li> <li>• can accept significant volatility and losses, and</li> <li>• seeks to obtain accelerated returns (potentially in a short timeframe).</li> </ul> <p>The consumer seeks extremely high risk, speculative or complex products which may have features such as significant use of derivatives, leverage or short positions or may be in emerging or niche asset classes (for example, crypto-assets or collectibles).</p>
Very high	<p>For the relevant part of the consumer's portfolio, the consumer:</p> <ul style="list-style-type: none"> <li>• has a very high risk appetite,</li> <li>• can accept very high volatility and potential losses (e.g. has the ability to bear 6 to 7 negative returns over a 20 year period 6 or 7), and</li> <li>• seeks to maximise returns (typically over a medium or long timeframe).</li> </ul> <p>The consumer typically prefers growth assets such as shares, property and alternative assets.</p>

High	<p>For the relevant part of the consumer’s portfolio, the consumer:</p> <ul style="list-style-type: none"> <li>• has high risk appetite,</li> <li>• can accept high volatility and potential losses (e.g. has the ability to bear up to 6 negative returns over a 20 year period (SRM 5 or 6), and</li> <li>• seeks high returns (typically over a medium or long timeframe).</li> </ul> <p>The consumer typically prefers predominantly growth assets such as shares, property and alternative assets with only a smaller or moderate holding in defensive assets such as cash and fixed income.</p>
Medium	<p>For the relevant part of the consumer’s portfolio, the consumer:</p> <ul style="list-style-type: none"> <li>• has a moderate or medium risk appetite, seeking to minimise potential losses (e.g. has the ability to bear up to 4 negative returns over a 20 year period (SRM 3 to 5) and comfortable with a moderate target return profile.</li> </ul> <p>Consumer typically prefers a balance of growth assets such as shares, property and alternative assets and defensive assets such as cash and fixed income.</p>
Low	<p>For the relevant part of the consumer’s portfolio, the consumer:</p> <ul style="list-style-type: none"> <li>• has a conservative or low risk appetite,</li> <li>• seeks to minimise potential losses (e.g. has the ability to bear up to 1 negative return over a 20 year period (SRM 1 to 2) and is comfortable with a low target return profile.</li> </ul> <p>Consumer typically prefers defensive assets such as cash and fixed income.</p>

**Consumer’s need to withdraw money**

This consumer attribute addresses the likely period of time between the making of a request for redemption/withdrawal (or access to investment proceeds more generally) and the receipt of proceeds from this request under ordinary circumstances. Issuers should consider both the frequency for accepting the request and the length of time to accept, process and distribute the proceeds of such a request. To the extent that the liquidity of the underlying investments or possible liquidity constraints (e.g. ability to stagger or delay redemptions) could impact this, this is to be taken into consideration in aligning the product to the consumer’s need to access capital. Where a product is held on investment platforms, distributors also need to factor in the length of time platforms take to process requests for redemption for underlying investments. Where access to investment proceeds from the product is likely to occur through a secondary market, the liquidity of the market for the product and likely realisable value on market should be considered, including in times of market stress.

## Distributor Reporting

### Significant dealings

Section 994F(6) of the Act requires distributors to notify the issuer if they become aware of a significant dealing in the product that is not consistent with the TMD. Section 994G of the Act requires the Issuer to notify ASIC if it becomes aware of a significant dealing in the product that is not consistent with the TMD. Neither the Act nor ASIC defines when a dealing is 'significant' and distributors have discretion to apply its ordinary meaning.

The Issuer will rely on notifications of significant dealings to monitor and review the product, this TMD, and its distribution strategy, and to meet its own obligation to report significant dealings to ASIC.

Dealings outside this TMD may be significant because:

- they represent a material proportion of the overall distribution conduct carried out by the distributor in relation to the product, or
- they constitute an individual transaction which has resulted in, or will or is likely to result in, significant detriment to the consumer (or class of consumer).

In each case, the distributor should have regard to:

- the nature and risk profile of the product (which may be indicated by the product's risk rating or withdrawal timeframes),
- the actual or potential harm to a consumer (which may be indicated by the value of the consumer's investment, their intended product use or their ability to bear loss), and
- the nature and extent of the inconsistency of distribution with the TMD (which may be indicated by the number of red and/or amber ratings attributed to the consumer).

Objectively, a distributor may consider a dealing (or group of dealings) outside the TMD to be significant if:

- it constitutes more than half of the distributor's total retail product distribution conduct in relation to the product over the reporting period,
- the consumer's intended product use is *Solution/standalone*, or
- the consumer's intended product use is *Core component* or higher and the consumer's risk (ability to bear loss) and return profile is *Low*.